

RICKY J. RAMSEY,)
)
Plaintiff,)
)
v.) NO: 3:12-1308
) JURY DEMAND
SUMNER COUNTY, TENNESSEE,) JUDGE TRAUGER
)
Defendant.)

It appearing to the Court, as evidenced by the signatures of counsel for the Parties below,
that the Parties have entered into the following Agreed Protective Order, and that the following
should be and is hereby **ORDERED**:

2. The Defendant is in possession of video taken inside the Sumner County Jail on August 29, 2012, (hereinafter the “Jail Video”). The Plaintiff has requested the Jail Video in discovery.

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4. Accordingly, the Parties agree that the Jail Video shall be disclosed and marked as “Confidential.”

5. The Parties agree that any documents marked “Confidential” (and any information contained therein) shall be kept confidential, shall be used for the purpose of this litigation only, and shall not be disclosed in any form to any person or entity except the Parties to this action, their attorneys (and their staff), the Court (if filed under seal) and any expert or other professional necessary to assist in the preparation of this case. Neither the “Confidential” documents, nor the information contained therein, shall be provided to any party to this action or any expert witness or other professional until the witness has been shown a copy of this Protective Order and agrees in writing to abide by its terms.

6. The Parties also agree that the Plaintiff, as a former inmate of the Sumner County Jail, shall be allowed to view the Jail Video but shall not be provided a copy of it and that his counsel shall retain any and all copies of the Jail Video.

7. Except when used in the prosecution or defense of this proceeding, each person to whom disclosure of any “Confidential” information is made in accordance with this order is hereby prohibited from divulging any of the material so obtained, from exploiting in any way such material for his or her own benefit, or from using such material for any purpose or in any manner not connected with the prosecution or defense of this action.

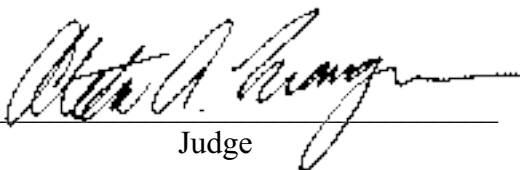
8. In the event that counsel for a party determines that the defense or prosecution of this proceeding requires that information which has been designated as “Confidential” be disclosed to someone other than as authorized herein, written consent from opposing counsel shall be requested, identifying the otherwise unauthorized person and designating the

information desired to be disclosed. If the request for consent is refused, the information shall not be disclosed without an order by the Court upon the motion of the requesting party.

9. Upon final disposition of this case, all information which has been designated as “Confidential” pursuant to this order and all copies, excerpts or extracts (except for such information which has become part of the record of this action), shall be returned to counsel for the Defendant.

10. Any party may request that the Court modify or otherwise grant relief from any provision of this order.

It is so **ORDERED**.



Judge

APPROVED FOR ENTRY:

s/ Thomas B. Russell

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Attorneys for Defendant

s/ Phillip L. Davidson (with permission) _____

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May, 2013, a copy of the foregoing **Agreed Protective Order** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

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s/ Thomas B. Russell _____